

Before the
Federal Communications Commission
Washington, DC 20054

In the Matter of:

Amendment of 73.202
Table of Allotments
FM Broadcast Stations
(Stanfield, Oregon)

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To: John Karousos
Allocations Branch

PETITION FOR RULEMAKING

Pursuant to 47 CFR 1.420 (g), Luella Hoskins, respectfully proposes that the FCC institute a Rule Making proceeding to amend the FM Table of Allotments to allocate channel 241C3 at Stanfield, Oregon as its first broadcast service.

Attached hereto is an engineering report, which contains information relating to the proposed allocation to Stanfield, Oregon. The engineering study clearly demonstrates that:

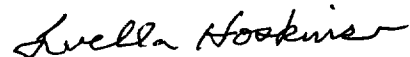
- (a). Stanfield is a community in which the commission should allocate first broadcast service.
- (b). There is sufficient area in which to locate a new station's transmitter facility which is fully spaced in accordance with the FCC's minimum mileage separation requirements. See Engineering Report "FM Channel Separation Study."
- (c). From the chosen site's reference coordinates, 70Dbu (city grade) coverage will encompass all of the proposed city of license. See 70 dBu coverage Map.

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The allocation of channel 241C3 at Stanfield, Oregon would result in that community receiving it's first broadcast service, a matter of the FCC's highest priority in its scheme of FM allotments. If allocated, the Petitioner certifies that she will apply with the Commission for a construction permit to build the new station and a new station will be promptly built.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Luella Hoskins".

Luella Hoskins
84889 March Road
Milton-Freewater, OR 97862

ENGINEERING STATEMENT
Channel 241C3
Proposed Allocation at Stanfield, Oregon

STANFIELD IS A COMMUNITY FOR FCC ALLOTMENT PURPOSES

Stanfield, OR (city)
Population (1990): 1568
Location: 45.78631 N, 119.21953 W
Zip Code(s): 97875

The Communications Act requires the FCC to allot all radio frequencies in a "fair" manner among the nation's various "communities." Accordingly, the FCC historically has endeavored to allot radio frequencies to any "community" – regardless of size and whether or not incorporated.

According to the United States Census Bureau, Stanfield has a 1990 population of 1568 persons. Stanfield has an elected government with six councilmen and a Mayor. Stanfield's Census designation as a "City" is consistent and legally sufficient as a basis under FCC precedent to demonstrate its status as a community in which a new FM channel can be allotted.

Stanfield is located in Umatilla County, Oregon and has its own US Post Office, city hall, water district, police department, library, fire department and school system.

Stanfield has several stores and commerce including a grocery store, automotive supply, restaurants, convenience store, and a bank.

MINIMUM SPACING REQUIREMENTS

At a point corresponding to the following geographic coordinates, which is 17.2 Kilometers to the southwest of Stanfield town center, channel 241C3 can be allotted in compliance with the minimum distance separation requirements 47 CFR 73.207.

North Latitude: 45 degrees, 40 minutes, 40 seconds

West Longitude: 119 degrees, 23 minutes, 01 seconds

From these reference coordinates, channel 241C3 is fully spaced to all FCC assignments, allotments and proposals contained within the latest FCC FM Engineering Database. See attached FM Channel Spacing Study. Furthermore, the Attached Area to Locate Map shows that channel 241C3 can be allocated in accordance with the commission's rules.

CONCLUSION

The results of this study demonstrate that the FM table of Allotments may be amended in technical compliance with all applicable spacing rules. Therefore, the Petitioner respectfully requests the following changes to the Table:

<u>PRESENT</u>	
<u>CITY</u> Stanfield, OR	<u>CHANNEL</u> None
<u>PROPOSED</u>	
<u>CITY</u> Stanfield, OR	<u>CHANNEL</u> 241 C3

***** FM CHANNEL SPACING STUDY *****

Job title: FM Study 1
 Proposed latitude: N 45 40 40.00
 Proposed longitude: W 119 23 1.00
 Database file name: C:\Program Files\EDX\FCC_DATA\Fm981116.edx
 Use pre-1989 Class A spacings?: N

Proposed channel: 241C3

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
241C1	KSRVFM	22979	Ontario	OR	LIC	131.7	265.6	211.0	
241C	KNFR	23415	Opportunity	WA	LIC	39.0	274.4	237.0	
239C	KNLT	23760	Walla Walla	WA	LIC	69.6	100.4	96.0	4.4
242C2	KRCW	24101	Royal City	WA	CP	3.7	121.1	117.0	4.1
242C2	ALLOTM	24102	Royal City	WA	VACANT	3.7	121.1	117.0	4.1
242A	KRCW	24103	Royal City	WA	CP	354.1	126.2	89.0	
240C3	KGER	24144	Quincy	WA	CP	350.3	185.4	99.0	
240A	KULEFM	24145	Ephrata	WA	LIC	355.5	183.2	89.0	
244A	KZTB	24566	Sunnyside	WA	CP	325.5	86.9	42.0	
244A	KZTB	24567	Sunnyside	WA	LIC	325.5	86.9	42.0	
243C	KWEG	25101	Warm Springs	OR	LIC	237.9	172.4	96.0	
241C	KXXO	25685	Olympia	WA	LIC	295.3	260.9	237.0	23.9

***** End of channel 241 study *****

